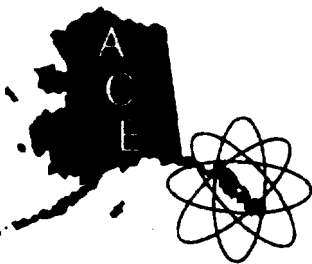


DOCKET FILE COPY ORIGINAL

GERALD J. WHITETHORN  
RICHARD TAMLIN

211 S. NORDIC DRIVE, PO BOX 1550  
PETERSBURG, ALASKA 99833

TEL: (907) 772 3893  
FAX: (907) 772 3894



## ALASKA COMMERCIAL ELECTRONICS

RECEIVED

October 12, 1993

OCT 18 1993

To: Secretary, FCC  
Washington, DC 20554 **FCC MAIL ROOM**

From: Gerald J. Whitethorn  
Richard Tamblin  
Alaska Commercial Electronics

In Reference to: REPORT NO. 1972 RM NO. 8352

**"Request amendment of the rules permitting the use of facsimile over some private coast and ship to ship VHF channels in the 156 - 162 Mhz band."**

Dear Secretary,

In August, 1993 we requested an amendment to the rules that resulted in the request for public comment mentioned above. Please find the additional comments in support of the amendment.

In reference to Report No. 1972, RM No. 8352. We support the amendment to the rules for the following reasons and believe that allowing the use of VHF ship - to - ship and private coast station channels for facsimile communications will:

No. of Copies rec'd  
List ABCDE

0410

1. Relieve congestion on the marine VHF channels by providing a more efficient means of radio communications, allowing more information to be exchanged in a lesser amount of time.  
[PR Docket No. 91-293, Report and Order, section III, paragraph 5, 9]
2. Relieve the heavily congested Public Coast stations of excessive traffic and consequently allow more users to have access to the telephone network.
3. Provide facsimile service in areas that are not covered by Public Coast stations.
4. Provide an economical means of communications for the hearing and speech impaired.
5. Provide for improved commercial fisheries management by allowing the efficient transmission of test results, closures, boundaries and other critical information.
6. Reduce the use of unauthorized frequencies by providing a means of relatively private communications between ships and between ships and coast stations.
7. Improve safety at sea by allowing the transmission of complex information such as schematics, weather reports, engineering diagrams, NOAA charts, etc.  
[PR Docket No. 91-293, Report and Order, section III, paragraph 5]
8. Allow for the introduction of new technology to provide enhanced communication services to users in the Maritime Services.  
[PR Docket No. 91-293, Report and Order, section II, paragraph 3]
9. Allow marine based businesses to be operated in a more efficient manner by providing convenient access to important business information.

### **Co-Channel Interference**

We have tested our VHF Fax interface device extensively this past summer using three Public Coast Stations. We have found no reason to believe that fax transmission will cause co-channel interference if used on ship to ship or ship to shore simplex channels.

Co-channel interference will be no more than that caused by the use of digital voice scramblers. The use of scramblers, permitted under the rules, does not increase channel efficiency and is not considered to cause excessive co-channel interference. We believe that facsimile communications should be evaluated with the same criteria applied to digital scramblers.

### **Adjacent Channel Interference**

We do not believe that fax operation will cause adjacent channel interference as long as the transmit signal passes through the microphone circuit of a type accepted and properly adjusted marine radio. This is in keeping with the findings recorded in PR Docket No. 91-293 (section III, paragraph 4) namely, "such use would be subject to the same bandwidth and emission limitations as voice operations and, therefore, should not cause harmful interference. Our own documented studies also support these findings.

### **Demand**

In PR Docket No. 91-293, Report and Order, section III, paragraph 11 it was stated that there was not sufficient public demand shown for such services (ship - to - ship and ship to private coast station fax communications). Contrary to this finding, we have received many requests for this service from all over the country, including New York, Florida, California, Alaska, Hawaii and the Gulf Coast region. We find that there is considerable demand for such service and believe the demand will increase as the public becomes aware that such service is possible.

Finally we believe that this amendment would be in keeping with the Commission's actions in the past.

On these occasions it has amended the rules to allow for new technology to improve the communication services available to users in the Maritime Services.

Sincerely,

*Richard Tamblin*

Richard Tamblin

*Gerald J. Whitethorn*

Gerald Whitethorn

Alaska Commercial Electronics.